

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

(For permits requiring public notice)

Title V Draft No. V-99-045

MONTAPLAST OF NORTH AMERICA.

Frankfort, KY 40601

December 15, 1999

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Plant I.D. # 102-1320-0048

Application Log # F934

SOURCE DESCRIPTION:

Montaplast of North America, Inc., manufactures automotive wheel covers and intake manifolds. The plant is located at 2011 Hoover Boulevard, in Frankfort, Kentucky. The plant consists of the following operational areas – injection molding machines, washing lines, paint spray booths, lost processes, regrinders, and hopper dryers. The injection molding machines extrude the wheel covers. The washing line cleans the plastic wheel covers prior to painting. The painting process consists of two spray booths, a base coat booth and a clear coat booth. Each spray booth consists of a water wall to control over spray of the paint. The lost core process is equipped with injection molding machines to form automobile intake manifold. Reject wheel covers and intake manifolds are sent to the regrinders / shedders.

COMMENTS:

Paint Usage:

The paint usage of both base coat and clear coat will be restricted to same amount as the current permit (F-95-006) held by the facility. Since the annual usage of paint will be limited by the permit, the paint booths cannot be operated continuously, even though the plant will operate year-round.

Air Quality analysis:

Maximum hourly toxic emission for the permit will remain as the previous permit. The numbers were accepted based on the adjusted significant level of 401 KAR 63:022. This regulation does not exist any more. The division wants to maintain the same numbers for maximum hourly toxic emissions from the source. The potential to emit VOC for the paint booths is estimated to be 248.9 tons per year.

3. Type of control and efficiency:

None of the significant VOC emission points are equipped with control. Particulate emission is controlled by water wall. The efficiency of controlling particulate matter claimed by the facility is 95%.

4. Emission factors and their source:

Emissions of VOCs and HAPs from each type of base coat, clear coat, solvent thinner, diluent, or any other volatile material used were based on the formulation (MSDS) of each material.

It was assumed that all (100%) of the VOC or HAP content would be emitted as air emissions.

Applicable regulations:

Due to particulate emissions, the affected facilities are subject to the requirement of 401 KAR 59:010, New process operations.

- b. The annual VOC emissions are predicted to be major amount according to the definition in 401 KAR 50:035, Permits. The source is in attainment area. There is no process specific regulation applying to emissions of VOC for major source over 100 tons in an attainment area for coating of plastic automotive wheel covers in Kentucky Administrative Regulations.

The source is potentially major for three hazardous pollutants listed in the 401 KAR 63:060 methyl ethyl ketone, xylene, and ethyl benzene. MACT regulation has not yet been finalized for this category of industry.

- d. Regulation 401 KAR 59:010, *New process operation*, applies to each of the molding wheel covers, injection intake manifolds, Regrinders / shredders and hopper dryer. Given the low level emissions from these units, it has been designated as an insignificant activity.

EMISSION AND OPERATING CAPS DESCRIPTION:

The permittee has elected to accept a plant-wide emission limit of 249.9 tons per year for VOC emissions to preclude the applicability of Regulation 401 KAR 51:017, *Prevention of Significant Deterioration (PSD) of Air Quality*. Accordingly, the permit contains requirements for the permittee to calculate and maintain records of the actual VOC emissions from the entire facility for any 12 consecutive month period.

OPERATIONAL FLEXIBILITY:

Not applicable

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.